

**AFFIDAVIT**

I, Justin Lewis, being first duly sworn, hereby depose and state as follows:

**AGENT INTRODUCTION AND BACKGROUND**

1. I am a United States Postal Inspector with the United States Postal Inspection Service and have been so employed since August 2002. I am currently assigned to the Kansas City Field Office of the Postal Inspection Service and have experience enforcing federal mail and drug laws. This affidavit is based on my own personal knowledge and information given to me by other Postal Inspectors and other law enforcement personnel.

2. I received basic training for approximately 12 weeks from the United States Postal Inspection Service regarding individuals using the United States Mail to transport-controlled substances and proceeds from the sale of controlled substances as well as the use of Postal Money Orders to launder the proceeds of controlled substances. I received formal training for one week in March 2003, when I attended the United States Postal Inspection Service Narcotics training course in San Diego, California. This training involved narcotic investigation techniques, chemical field testing, and training in the identification and detection of controlled substances and narcotic proceeds being transported in the United States Mail and other commercial carriers. As a United States Postal Inspector, I have been involved in over 200 illegal narcotic investigations involving the United States Mail and have been identified by the U.S. Postal Inspection Service as a Subject Matter Expert (SME) in narcotic cases involving the United States Mail.

3. As a result of my experience and training, I am familiar with the common practices used by drug traffickers to smuggle drugs and money through airports and commercial mail/parcel carriers. Based on this experience, I have become well versed in the methodology used in narcotics

trafficking operations, the specific types of language used by narcotic traffickers, the unique trafficking patterns employed by narcotics organizations and their patterns of drug abuse.

4. This affidavit is based upon my personal knowledge, experience and training, and other information developed during this investigation. This affidavit is also based upon information and experience imparted to me by other law enforcement officers. Because this affidavit is being submitted for the limited purpose of establishing probable cause and securing a search warrant, I have not included each fact known to me concerning this investigation. I have set forth the facts I believe are necessary to establish probable cause to believe that violations of Title 21, United States Code, Sections 841 and 846, have been committed and that United States Postal Service (“USPS”) Priority Express Mail Parcel EI354107811US (“**Target Parcel**”) addressed to “Lance Williams 5730 Michigan Ave Kansas City MO 64130” (“**Target Residence**”) and lists the sender as “Emily Brown 4121 N 18<sup>th</sup> St Phoenix, AZ 85016” contains evidence of these violations.

5. This affidavit is made in support of a warrant to search the **Target Residence** and property, as more particularly described in “Attachment A,” and for authority to seize evidence, fruits, and instrumentalities, of crimes against the United States, specifically, in violation of Title 21, United States Code, Sections 841 and 846, as more particularly described in “Attachment B.” Further, this affidavit is made in support of an order to install and monitor, in private areas, including but not limited to private residences and vehicles, a beeper transponder device and a Global Positioning System (“GPS”) device, both of which will be placed inside the **Target Parcel** during a controlled delivery of the parcel to the **Target Residence**.

## **BACKGROUND**

6. Based upon my training and experience, I know that drug traffickers often use any means available to transport controlled substances. One common method of smuggling drugs is to ship controlled substances through the United States mail, including Priority Express Mail parcels used for scheduled delivery, and other overnight carriers.

7. Based upon my training and experience, I am also aware that persons who engage in distributing controlled substances use cell phones and other communication devices in order to store contact lists and to arrange for delivery and distribution of controlled substances. Additionally, I am aware that persons involved in distributing controlled substances keep and maintain firearms and other explosive devices to protect themselves from other drug traffickers and from apprehension by law enforcement officers.

## **FACTS ESTABLISHING PROBABLE CAUSE**

8. On November 29, 2022, I identified and took possession of the **Target Parcel** at the Kansas City, Missouri, Processing & Distribution Center, located at 1700 Cleveland Avenue in Kansas City, Missouri. I identified the **Target Parcel** as containing the following suspicious characteristics:

- The **Target Parcel** originated from a known drug source area (*i.e.*, Phoenix, Arizona);
- The **Target Parcel** has a handwritten address label;
- The **Target Parcel** is similar in size and weight of parcels seized containing controlled substances.

9. A query of the Postal Service databases identified the **Target Parcel's** \$73.35 postage was paid at a mailing contract facility and not a post office. Per my training and experience, I know individuals mailing parcels containing illegal narcotics often pay for postage

at contract facilities to hide the mailer's identity in the event the parcel is identified by law enforcement.

10. A query of the listed return address of the **Target Parcel** (Emily Brown 4121 N. 18<sup>th</sup> Street Phoenix, Arizona, 85016) was done in open sources and the address was identified as being a valid address, but listed sender, Emily Brown, was not identified as being associated to the address. Per my training and experience, I know that drug traffickers often use fictitious names/addresses or no names on parcels containing narcotics to hide the identity of the mailer in the event the parcel is identified by law enforcement.

11. A query of the listed delivery address of the **Target Parcel** (Lance Williams 5730 Michigan Avenue Kansas City, Missouri, 64130) was done in open sources. Listed recipient Lance Williams was not identified as being associated to the address in open sources. Per my training and experience, I know drug traffickers often list fictitious names or don't list a recipient and often mail to vacant addresses to hide the true identity of the intended recipient in the event the parcel is identified by law enforcement. A review of Postal Service records identified the **Target Residence** (5730 Michigan Avenue, Kansas City, Missouri, 64130) received a 4.1875-pound parcel originating from Phoenix, Arizona, on November 17, 2022. This prior Express Mail Parcel's postage was \$73.35, which is the same as the **Target Parcel**.

12. On November 29, 2022, I contacted Jackson County Drug Task Force Officer Ryan Painter and coordinated an exterior odor search of the **Target Parcel** at the U.S. Postal Service Kansas City, Missouri, Processing & Distribution Center, located at 1700 Cleveland Avenue in Kansas City, Missouri. I placed the **Target Parcel** on the floor with ten other similar sized parcels. The **Target Parcel** was placed before Officer Painter and canine Harlow entered the area. At approximately 9:10 a.m., I observed Officer Painter enter the room with Harlow and Officer

Painter instructed Harlow to search. When Harlow searched the **Target Parcel**, she rested her front legs and nose on the **Target Parcel**. Officer Painter tried pulling and calling Harlow away from the **Target Parcel**, but Harlow would not move. Officer Painter said Harlow's actions indicated she had alerted to the **Target Parcel** as containing a narcotic odor.

13. According to Officer Painter, Harlow is a one-year-old, German Shorthaired Pointer. Harlow was certified by the Missouri Police Canine Association on May 19, 2022. Harlow is trained to detect the odors of cocaine, heroin, methamphetamine and MDMA. Since being certified, Harlow has recovered 6,711.58 grams of methamphetamine, 521.1 grams of cocaine, 16,113 grams of fentanyl pills, 9 grams of fentanyl powder and 9.5 grams of heroin.

14. On November 29, 2022, the Honorable Lajuana M. Counts, U.S. Magistrate Judge for the Western District of Missouri signed search warrant 22-SW-00694-LMC for the **Target Parcel**. On November 30, 2022, at approximately 6:45 a.m., Kansas City, Missouri, Detective Elliott Riggins and I executed search warrant 22-SW-00694-LMC at the Kansas City, Missouri, Police Department Drug Enforcement Unit, which is located at an undisclosed location within the Western District of Missouri. Priority Express Mail Parcel EI354107811US ("**Target Parcel**") was opened, and ultimately contained ten individual hand tied clear plastic bags of small blue pills scored as M-30. The approximate 10,000 pills weighed approximately 1,145.38 grams. Per my training and experience, these pills appear to be counterfeit Oxycodone (a Schedule II stimulant) pills that are typically manufactured with fentanyl. A single pill was field-tested and identified as containing Acetaminophen. Per my training and experience the field-test of counterfeit M-30 pills generally identify them as Acetaminophen, but a laboratory analysis will identify the fentanyl.

15. On November 30, 2022, the Postal Inspection Service, along with other federal and state law enforcement agencies, intend to conduct a controlled delivery of the **Target Parcel** to

the **Target Residence**. Prior to delivery, law enforcement will remove all the narcotics from the **Target Parcel** and replace it with a representative sample and a sham substance similar in appearance to the original contents of the package along with the transmitter beacon and GPS tracking device. A Postal Inspector, acting in an undercover capacity, will deliver the **Target Parcel** to the **Target Residence**. Law enforcement does not know how many people will be located inside the **Target Residence** of the property. Based upon my training and experience, and because it is difficult to determine precisely when the recipient or intended recipient will open the **Target Parcel** to retrieve the substance inside, this application seeks permission for law enforcement to install an entry detection or transponder device, also known as a beeper, and a GPS tracking device, within the **Target Parcel**. Law enforcement will then deliver the **Target Parcel** with the sham substance along with the GPS and beeper and will use the tracking devices to always monitor the whereabouts of the parcel in question, including those times when the package has entered the **Target Residence** or other private property on the **Target Residence's** property. The beeper device will also reveal if, and when, the package is opened. These devices are transmitters only and will not monitor voice conversations.

16. The beeper will emit a signal when the **Target Parcel** is opened, which will alert law enforcement the moment the **Target Parcel** is opened. Because law enforcement expects the **Target Parcel** will be taken into a private property when the **Target Parcel** is accepted, authority is sought to monitor the signals of the transponder in private areas, such as buildings, residences and other like closed structures, which are not public, including, but not limited to the **Target Residence**.

17. It is unknown when the **Target Parcel** will be opened by the intended recipient. When law enforcement officers are notified by beeper that the **Target Parcel** has been opened

inside the **Target Residence**, individuals opening the package may discover that the package has been altered and that a beeper has been placed inside the package. As a result, they may destroy evidence or otherwise take actions which would prevent law enforcement from recovering evidence located inside the premises or to otherwise identify individuals involved in criminal activity.

18. This application requests the authority for law enforcement to enter the property of the **Target Residence** and conduct a search if the parcel is delivered and taken into the **Target Residence**. Law enforcement will use the tracking equipment to track the **Target Parcel's** location on the **Target Residence's** property. Law enforcement requests authority to conduct a search of the **Target Residence** once the **Target Parcel** enters the **Target Residence**. Electronic equipment sometimes fails and is used only to assist law enforcement in the investigation. Law enforcement will use the electronic equipment to track the **Target Parcel** and seek the best time to execute the search warrant after the parcel is taken into the **Target Residence**. In case the beeper device never alerts to the parcel being opened or otherwise malfunctions, law enforcement still requests the authority to enter the **Target Residence** to retrieve the government owned electronic equipment as well as conduct a search.

19. It has been the experience of law enforcement the intended recipients of parcels containing illegal controlled substances often have the drug parcels mailed to addresses they are not associated with, in order distance themselves from being arrested during a controlled delivery. In those situations, after the delivery is made, the recipient generally drives the drug parcel to another location, or the intended recipient picks up the parcel and drives it to another location.

20. Currently, law enforcement does not know the ultimate destination of the **Target Parcel**. Thus, this application seeks permission for law enforcement to install a global positioning

system (“GPS”) tracking device within the parcel. Law enforcement will then deliver the **Target Parcel** with the sham substance along with the GPS and beeper and will use the GPS to always monitor the whereabouts of the Target Parcel, including those times when the **Target Parcel** has entered the **Target Residence** or other private property, including at its ultimate destination. The GPS device will allow law enforcement to follow the **Target Parcel** if, and when, the **Target Parcel** is taken to another location or monitor its location on the **Target Residence’s** property.

24. The **Target Parcel** will be delivered to the **Target Residence**, during daylight hours however, it is unknown when the **Target Parcel** will be opened by the intended recipient. When law enforcement officers are notified by beeper the **Target Parcel** has been opened inside the **Target Residence**, individuals opening the package may discover the package has been altered and a beeper has been placed inside the package. As a result, they may destroy evidence or otherwise take actions which would prevent law enforcement from recovering evidence located inside the premises or to otherwise identify individuals involved in criminal activity. Accordingly, since the **Target Parcel** may be opened after daytime hours and may result in the destruction of evidence, additional authority is sought to enter and search the **Target Residence** at any time, regardless of the time of day.

25. Because of the sensitive nature of the investigation, an order is sought sealing the application, affidavit, search warrant, and tracking device order.



## **CONCLUSION**

26. Applicant seeks authority to enter the **Target Residence** after the **Target Parcel** is delivered and taken into the **Target Residence** to search for and seize fruits, evidence, and/or instrumentalities of the specified federal offenses. More particularly, there is probable cause to believe that at the **Target Residence** in which the **Target Parcel** is accepted and taken inside at the time of the execution of the search warrant (upon satisfaction of the stated condition precedent, i.e., that the **Target Parcel** is accepted and taken into the **Target Residence**) there will be the items, materials, and objects described in Attachment B to the search warrant for which is incorporated herein as set forth in full. As a result, there is probable cause to believe that within the **Target Residence**, there is now and will be located the fruits, evidence, and instrumentalities as set forth in Attachment B.

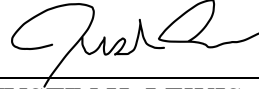
27. Accordingly, I respectfully request the Court issue:

a. A search warrant for the **Target Residence** of 5730 Michigan Avenue, Kansas City, Missouri, 64130, which law enforcement may execute once the **Target Parcel** enters the Target Residence.

b. An order permitting law enforcement to monitor, in private areas, the signals emitted by a beeper device and GPS transmitter, which will be installed in the **Target Parcel** to alert law enforcement when the parcel is opened and track the location of the parcel.

c. An order sealing the search warrant application, affidavit, search warrant, and tracking device order until further order of this Court.

Further, affiant sayeth not.

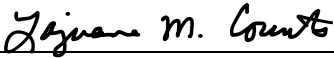


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JUSTIN H. LEWIS  
Postal Inspector  
United States Postal Inspection Service

Sworn to and subscribed via telephone on this  
30th \_\_\_\_\_ day of November 2022.

Sworn to by telephone  
1:24 PM, Nov 30, 2022



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HONORABLE LAJUANA M. COUNTS  
United States Magistrate Judge  
Western District of Missouri

